

EXHIBIT Q

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

-----X		CHAPTER 11
In re:	:	Case Nos. 18-71748 (AST), 18-71749 (AST), 18-71750
	:	(AST), 18-71751 (AST), 18-71752 (AST), 18-71753
	:	(AST), 18-71754 (AST), 18-71755 (AST), 18-71756
ORION HEALTHCORP, INC., <i>et al.</i> ,	:	(AST), 18-71757 (AST), 18-71758 (AST), 18-71759
	:	(AST), 18-71760 (AST), 18-71761 (AST), 18-71762
Debtors.	:	(AST), 18-71763 (AST), 18-71764 (AST), 18-71765
	:	(AST), 18-71766 (AST), 18-71767 (AST), 18-71789
-----X		(AST), 18-74545 (AST)

**RESERVATION OF RIGHTS OF HEALTHTEK SOLUTIONS, LLC
TO APPLICATION OF PARMJIT SINGH PARMAR AND THE
PARMAR ENTITIES FOR AN ORDER APPOINTING AN EXAMINTER
PURSUANT TO §§ 1104(A), (C) AND (E) AND 1106(A)(3), (4) AND (6)**

[This Objection Relates to the Motion at ECF No. 561]

TO THE HONORABLE ALAN S. TRUST,
UNITED STATES BANKRUPTCY JUDGE:

Healthtek Solutions, LLC (“Healthtek”), by its undersigned counsel, hereby files this reservation of rights with respect to the *Application of Parmjit Singh Parmar and the Parmar Entities for an Order Appointing an Examiner Pursuant to §§ 1104(a), (c) and (e) and 1106(a)(3), (4) and (6)* (the “Examiner’s Motion”)¹ and respectfully states as follows:

1. Healthtek was the stalking horse bidder for and ultimate successful purchaser of certain of the assets of debtor New York Network Management, LLC (the “NYNM Sale”).² Healthtek takes no position with respect to the relief sought in the Examiner’s Motion and lacks the requisite knowledge of the Debtors’ affairs to address the vast majority of the allegations made by the Parmar Entities therein. However, the Examiner’s Motion makes certain allegations against Healthtek and its principals that Healthtek cannot let go unanswered.

¹ Capitalized terms not otherwise defined in this Objection shall have the meanings ascribed to such terms in the Motion.

² See Order (I) Approving Asset Purchase Agreement and Authorizing the Sale of Certain Assets of New York Network Management, L.L.C.; (II) Authorizing the Sale of Assets Free and Clear of All Liens, Claims, Encumbrances and Interests; (III) Authorizing the Assumption, Sale and Assignment of Certain Executory Contracts and Unexpired Leases; and (IV) Granting Related Relief [Docket No. 445].

2. The Examiner's Motion alleges that "[o]n information and belief, TG Capital/HealthTek's bids were also orchestrated and funded by Chinh Chu," a principal of the Debtors' controlling shareholder. *See* Examiner's Motion ¶¶ 127-129. These allegations have no basis in fact and are simply untrue. Healthtek's participation in the Debtors' sales processes was without exception on an arm's length basis and Healthtek conducted itself in good faith at all times. Healthtek categorically denies any accusations that it colluded with Mr. Chu, the Debtors or any of the Debtors' professionals or otherwise acted in manner that in any way compromised the integrity of the sale process. In fact, Healthtek can affirmatively state that neither it nor any of its management, principals or investors has any relationship with Mr. Chu whatsoever.

3. Healthtek hereby reserves its rights in all respects, including the right to (i) be heard and present evidence on all matters in connection with the NYNM Sale, and (ii) pursue any and all claims or causes of action for any damages to Healthtek's business arising from the Parmar Entities' baseless accusations.

Dated: November 23, 2018
New York, New York

Respectfully submitted,

BAKER BOTTS LLP

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